

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
MICHAEL PICARELLA,

Plaintiff,

-against-

HSBC (USA) SECURITIES, INC.,

Defendant.
----- X

:
:
: 14-cv-4463 (ALC) (AJP)
:
:

**NOTICE OF PLAINTIFF'S
OPPOSITION TO
DEFENDANT'S MOTION
FOR SUMMARY
JUDGMENT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment; Plaintiff's Response to Defendant's Local Civil Rule 56.1 Statement of Material Facts; the Declaration of James R. Hubbard in Support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment with accompanying exhibits (collectively, "Moving Papers"); and all prior pleadings and proceedings herein, Plaintiff Michael Picarella hereby moves for an order denying Defendant's Motion for Summary Judgment.

PLEASE TAKE FURTHER NOTICE that the Moving Papers are being served on Defendant HSBC, and courtesy copies delivered to the Court, but that the Moving Papers are not being filed on the Court's docket at this time due to the pendency of various interested parties' motions for protective orders. The Moving Papers shall be filed in accordance with the Court's resolution of those motions.

Dated: July 17, 2015
New York, New York

Respectfully submitted,

LIDDLE & ROBINSON, L.L.P.

By: /s/ James R. Hubbard

James R. Hubbard

Marc A. Susswein

800 Third Avenue

New York, New York 10022

(212) 687-8500

Attorneys for Plaintiff Michael Picarella

AFFIRMATION OF SERVICE

I, James R. Hubbard, declare under penalty of perjury that I caused to be served on July 17, 2015, this Notice of Motion and the Moving Papers referenced therein upon all other parties in this case by electronic delivery to:

Damien J. Marshall – dmarshall@bsfllp.com

Camille Oberkamp – coberkamp@bsfllp.com

Ilana R. Miller – imiller@bsfllp.com

Joshua J. Libling – jlibling@bsfllp.com

Eugene Scalia – escalia@gibsondunn.com

Gabrielle Levin – glevin@gibsondunn.com

Dated: July 17, 2015

LIDDLE & ROBINSON, L.L.P.

/s/ James R. Hubbard

James R. Hubbard
800 Third Avenue
New York, New York 10022
(212) 687-8500

